

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust
Litigation, MDL 2817*

No. 1:18-CV-864

This filing relates to:

Hon. Robert M. Dow, Jr.

THE DEALERSHIP CLASS ACTION

Magistrate Judge Jeffrey T. Gilbert

*Cox Automotive, Inc, et al. v. CDK Global,
LLC, Case No. 1:18-CV-1058 (N.D. Ill.)*

*Loop, LLC, d/b/a AutoLoop v. CDK Global,
LLC, Case No. 18-cv-2521 (N.D. Ill.)*

*Authenticom, Inc. v. CDK Global, LLC et al.,
Case No. 1:18-cv-00868 (N.D. Ill.)*

*Motor Vehicle Software Corp. v. CDK Global,
Inc., et al., Case No. 1:18-cv-865 (N.D. Ill.)*

DECLARATION OF CHRISTOPHER TRAGASZ

I, Christopher Tragasz, declare as follows:

1. I am the Lead Cyber Forensics Analyst for the Global Security Organization of CDK Global, LLC ("CDK"). I have held this position at CDK since July 13, 2015.

2. As the Lead Cyber Forensics Analyst, my duties include preserving, collecting and searching information as part of CDK's e-discovery process, conducting digital investigations, and managing evidence. In connection with these roles, I am familiar with the extent to which telephone records are maintained by CDK.

3. CDK uses Voice over Internet Protocol (VoIP), rather than traditional landline, telephone numbers. Monthly call detail records (*i.e.*, records that purport to show the time, date, duration, and incoming or outgoing telephone number) associated with VoIP numbers assigned

to CDK employees, which may be re-assigned to different employees over time, are generally available back to approximately January 2017. Call detail records from earlier periods are not available. Individualized circumstances may limit the availability of call detail records for particular telephone numbers over the period January 2017 to the present.

4. CDK also allows certain employees to maintain accounts through CDK with third-party carriers (including AT&T, Verizon, and until 2016 Sprint) for wireless (cellular) services. To the extent they exist, billing and call detail records associated with employees' CDK-sponsored wireless accounts are maintained by the carriers.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on August 29, 2018, in Hoffman Estates.


Christopher Tragas